

Andrew Zollinger, State Bar No. 24063944
andrew.zollinger@dlapiper.com
DLA Piper LLP (US)
1717 Main Street, Suite 4600
Dallas, Texas 75201-4629
Telephone: (214) 743-4500
Facsimile: (214) 743-4545

Counsel For The Debtors

Thomas R. Califano (admitted *pro hac vice*)
Dienna Corrado (admitted *pro hac vice*)
thomas.califano@dlapiper.com
dienna.corrado@dlapiper.com
DLA Piper LLP (US)
1251 Avenue of the Americas
New York, New York 10020-1104
Telephone: (212) 335-4500
Facsimile: (212) 335-4501

Daniel M. Simon (admitted *pro hac vice*)
daniel.simon@dlapiper.com
DLA Piper LLP (US)
One Atlantic Center
1201 West Peachtree Street, Suite 2800
Atlanta, Georgia 30309
Telephone: (404) 736-7800
Facsimile: (404) 682-7800

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	
	§	Chapter 11
	§	
4 West Holdings, Inc. <i>et al.</i> , ¹	§	Case No. 18-30777 (HDH)
	§	
Debtors.	§	(Jointly Administered)

**SECOND MONTHLY APPLICATION OF DLA PIPER LLP (US) FOR ALLOWANCE
OF COMPENSATION FOR SERVICES RENDERED AND FOR REIMBURSEMENT
OF EXPENSES AS COUNSEL FOR THE DEBTORS AND DEBTORS-IN-POSSESSION
FOR THE PERIOD FROM APRIL 1, 2018 THROUGH APRIL 30, 2018**

FEE APPLICATION COVERSHEET

Monthly Fee Application of: DLA Piper LLP (US)

Capacity: Counsel for the Debtors

Time Period: April 1, 2018 through April 30, 2018

Bankruptcy Petition Filed: March 6, 2018

¹ A list of the Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, is attached hereto as **Exhibit A**.

Date of Entry of Retention Order: April 18, 2018

Amount Requested:

Fees: \$1,052,708.50 (at 80%: \$842,166.40)

Expenses: \$19,139.35

Total: \$1,071,847.85

Reductions:

Voluntary Fees: \$1,332.50

Expense reductions: \$0

Total Reductions: \$1,332.50

Draw Down Request:

Requested Draw Down: \$0

Remaining Retainer: \$57,473.00

Expense Detail:

Delivery Services: \$33.97

Online Research: \$7,758.65

Out-of-Town Travel: \$5.00

Meals: \$428.15

Miscellaneous: \$1,871.25

Duplicating: \$4,162.65

Internet Services: \$15.95

Car Service/Taxi: \$174.56

Hotel: \$1,832.69

Parking/Mileage Reimbursement: \$186.78

Air Fare: \$731.60

Transcripts: \$859.10

Hourly Rates

Highest Billed Rate:

\$1,135.00/hour

Paraprofessionals

\$355.00/hour

Total Hours Billed:

1,258.00

159.90

Blended Rate:

\$749.72/hour

\$330.68/hour

This is a(n): x monthly interim final application

Objection Deadline: June 19, 2018 at 4:00 p.m. (prevailing Central time)

Prior Applications Filed:

<i>Applications</i>					<i>CNOs</i>	
Date Filed	Docket No.	Period Covered	Total Fees	Expenses	Date Filed	Docket No.
05/14/2018	374	03/06/2018- 03/31/2018	\$580,502.00 (at 80%: \$464,401.60)	\$12,229.93	05/31/18	485

**COMPENSATION BY PROFESSIONALS
APRIL 1, 2018 THROUGH APRIL 30, 2018**

Name of Professional Individual	Position, Practice Group, Year Obtained Relevant License to Practice, Year Assumed Position	Hours	Rate	Amount
Califano, Thomas R.	Partner; Restructuring; Member of the New York Bar since 1989; Joined the Firm in 2002.	108.80	\$1,135.00	\$123,488.00
		9.00	\$567.50 (Non-working travel)	\$5,107.50
Klahr, Shmuel M.	Partner; Finance; Member of the New York Bar since 2005; Joined the Firm in 2011.	4.80	\$1,130.00	\$5,424.00
Simon, Daniel M.	Partner; Restructuring; Member of the Illinois Bar since 2008; Member of the Georgia Bar since 2014; Joined the Firm in 2011.	205.30	\$920.00	\$188,876.00
		15.00	\$460.00 (Non-working travel)	\$6,900.00
Brown, Kathy Owen	Senior Counsel; Litigation; Member of the Texas Bar since 1989; Member of the Colorado Bar since 1990; Member of the District of Columbia Bar since 1990; Joined the Firm in 2018.	103.80	\$920.00	\$95,496.00
Nelson, Karen	Partner; Litigation; Member of the Texas Bar since 1984; Member of the Arizona Bar since 2002; Joined the Firm in 2013.	11.50	\$775.00	\$8,912.50
Massiatte, Michael	Of Counsel; Employment; Member of the Texas Bar since 2000. Joined the Firm in 2018.	38.70	\$740.00	\$28,638.00
Mineroff, Kira L.	Associate; Finance; Member of the New York Bar since 2011; Joined the Firm in 2009.	4.70	\$905.00	\$3,258.00

Name of Professional Individual	Position, Practice Group, Year Obtained Relevant License to Practice, Year Assumed Position	Hours	Rate	Amount
Corrado, Dienna	Associate; Restructuring; Member of the New York Bar since 2009; Joined the Firm in 2014.	165.10	\$875.00	\$144,462.50
		21.50	\$437.50 (Non-working travel)	\$9,406.25
Jamison Woods, Crystal	Associate; Employment; Member of the Texas Bar since 2010; Joined the Firm in 2018.	37.70	\$800.00	\$30,160.00
Zollinger, Andy	Associate; Restructuring; Member of the Texas Bar since 2009; Joined the Firm in 2008.	100.30	\$795.00	\$72,106.50
Reddoch, Allison Amie	Associate; Employment; Member of the Texas Bar since 2011; Joined the Firm in 2018.	24.40	\$775.00	\$18,910.00
Avraham, David E.	Associate; Restructuring; Member of the Illinois Bar since 2012; Joined the Firm in 2014.	71.10	\$730.00	\$51,903.00
Angelo, Jason Daniel	Associate; Restructuring; Member of the New Jersey Bar since 2013; Member of the Delaware Bar since 2014; Member of the Pennsylvania Bar since 2016. Joined the Firm in 2017.	2.80	\$710.00	\$1,988.00
Sutton, Mordechai Y	Associate; Restructuring; Member of the New Jersey Bar since 2014; Member of the New York Bar since 2015; Joined the Firm in 2014.	7.40	\$690.00	\$5,106.00
Bernardo, Micala R.	Senior Attorney; Employment; Member of the Texas Bar since 2007; Joined the Firm in 2018.	120.60	\$675.00	\$81,405.00
		2.50	\$337.50 (Non-working Travel)	\$843.75
Lanza, Adam C.	Associate; Restructuring; Member of the New Jersey Bar since 2015; Member of the New York Bar since 2016; Joined the Firm in 2016.	17.20	\$625.00	\$10,750.00
Stefanova, Marina	Associate; Litigation; Member of the Texas Bar since 2014; Joined the Firm in 2018.	23.80	\$615.00	\$14,637.00

Name of Professional Individual	Position, Practice Group, Year Obtained Relevant License to Practice, Year Assumed Position	Hours	Rate	Amount
Callahan, Virginia	Associate; Restructuring; Member of the Maryland Bar since 2014; Joined the Firm in 2016.	42.30	\$560.00	\$23,688.00
Nair, Tara	Associate; Restructuring; Member of the Illinois Bar since 2016; Joined the Firm in 2016.	53.20	\$535.00	\$28,462.00
Williams, Jade	Associate; Restructuring; Member of the Illinois Bar since 2017; Joined the Firm in 2016.	41.00	\$535.00	\$21,935.00
O'Connor, Breegan	Associate; Employment; Member of the Texas Bar since 2017; Joined the Firm in 2018.	24.90	\$485.00	\$12,076.50
Masters, Melinda F.	Research and Knowledge Services; Business/Legal Research Analyst; Joined the Firm in 2005.	6.40	\$380.00	\$2,432.00
Nash, Maribel	Research and Knowledge Services; Business/Legal Research Analyst; Joined the Firm in 2016.	1.00	\$380.00	\$380.00
Countryman, William Lee	Senior Paralegal; Restructuring; Joined the Firm in 2002.	69.20	\$355.00	\$24,566.00
		8.50	\$177.50 (Non-Working Travel)	1,508.75
Lam Guerra, Yohami	Paralegal Specialist; Restructuring; Joined the Firm in 2014.	3.10	\$345.00	\$1,069.50
Eason-Hall, Erica	Senior Paralegal; Employment; Joined the Firm in 2018.	3.30	\$340.00	\$1,122.00
Grant, Derrell	Litigation Support Analyst; Litigation; Joined the Firm in 2014.	56.50	\$330.00	\$18,645.00
Fox, Carolyn B.	Paralegal Specialist; Restructuring; Joined the Firm in 2011.	4.20	\$285.00	1,197.00
Ford, Jenny	Paralegal Specialist; Restructuring; Joined the Firm in 2018.	4.50	\$280.00	\$1,260.00

Name of Professional Individual	Position, Practice Group, Year Obtained Relevant License to Practice, Year Assumed Position	Hours	Rate	Amount
Lisko, Stephanie A.	Paralegal Specialist; Restructuring; Joined the Firm in 2016.	5.20	\$280.00	\$1,456.00
TOTALS		1,418.00		\$1,052,708.50

COMPENSATION BY PROJECT CATEGORY FOR DLA PIPER LLP (US)
APRIL 1, 2018 THROUGH APRIL 31, 2018

Description	Hours	Amount
<i>Administration</i>		
Case Administration (B110)	22.20	\$13,300.00
Creditor Inquiries (B112)	6.70	\$5,669.00
Asset Sales and Other Disposition of Assets (B130)	122.50	\$99,321.50
Adequate Protection/Relief from Stay (B140)	45.20	\$32,048.50
Meetings and Communications with the U.S. Trustee and Creditors Committee (B150)	6.50	\$6,086.00
Court Hearings (B155)	119.10	\$82,746.00
Employment Applications (B160)	23.20	\$19,360.50
Fee Applications (B170)	39.20	\$21,829.00
Litigation and Contested Matters (B190)	690.30	\$515,273.00
Non-Working Travel (B195)	65.00	\$27,145.00
<i>Operations</i>		
Business Operations/Strategic Planning (B210)	190.90	\$164,282.00
Financial Reports (Monthly Operating Reports & Schedules & Statements) (B211)	23.50	\$9,350.00
Financing/DIP/Cash Collateral Matters (B230)	14.30	\$13,679.00
Claims Administration and Objections (B310)	16.40	\$13,162.00
Plan and Disclosure Statement / Business Plans (B320)	32.30	\$28,813.00
TOTAL	1,418.00	\$1,052,708.50

EXPENSE SUMMARY FOR DLA PIPER LLP (US)
APRIL 1, 2018 THROUGH APRIL 30, 2018

Expense Category	Total Expenses
Delivery Services	\$33.97
Online Research	\$7,758.65
Out-of-Town Travel	\$5.00
Meals	\$428.15
Miscellaneous	\$1,871.25
Duplicating	\$4,162.65
Internet Services	\$15.95
Car Service/Taxi	\$174.56
Hotel	\$1,832.69
Parking/Mileage Reimbursement	\$186.78
Air Fare	\$731.60
Transcripts	\$859.10
Total	\$19,139.35

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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	
	§	Chapter 11
	§	
4 West Holdings, Inc. <i>et al.</i> , ¹	§	Case No. 18-30777 (HDH)
	§	
Debtors.	§	(Jointly Administered)

**SECOND MONTHLY APPLICATION OF DLA PIPER LLP (US) FOR ALLOWANCE
OF COMPENSATION FOR SERVICES RENDERED AND FOR REIMBURSEMENT
OF EXPENSES AS COUNSEL FOR THE DEBTORS AND DEBTORS-IN-POSSESSION
FOR THE PERIOD FROM APRIL 1, 2018 THROUGH APRIL 30, 2018**

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Northern District of Texas, (the “Local Rules”) and the *Order*

¹ A list of the Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, is attached hereto as **Exhibit A**.

Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Dkt. No. 262] (the “Interim Compensation Order”), DLA Piper LLP (US) (“DLA Piper”) hereby files this *Second Monthly Application of DLA Piper LLP (US) for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses As Counsel for the Debtors for the Period from April 1, 2018 Through April 30, 2018* (the “Application”). By this Application, DLA Piper seeks an allowance and payment pursuant to the Interim Compensation Order for the sums of \$1,052,708.50 as compensation and \$19,139.35 for reimbursement of actual and necessary expenses for a total of \$1,071,847.85, for the period from April 1, 2018 through and including April 30, 2018 (the “Compensation Period”). In support of this Application, DLA Piper respectfully represents as follows:

BACKGROUND

1. On March 6, 2018 (the “Petition Date”), each Debtor filed with this Court a voluntary petition for relief under chapter 11 of the Bankruptcy Code, commencing these chapter 11 cases.
2. The Debtors are operating their businesses and managing their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.
3. On March 16, 2018, the office of the United States Trustee appointed the official committee of unsecured creditors (the “Committee”) in these chapter 11 cases.
4. DLA Piper was retained effective *nunc pro tunc* as of the Petition Date by this Court’s *Order Granting Application of the Debtors for an Order Authorizing the Employment and Retention of DLA Piper LLP (US) as Counsel Nunc Pro Tunc to the Petition Date* [Dkt. No. 264] (the “Retention Order”). The Retention Order authorizes DLA Piper to be compensated on an hourly basis and to be reimbursed for actual and necessary out-of-pocket expenses. On the same date, the Court entered the Interim Compensation Order.

5. Additional information regarding the Debtors and these chapter 11 cases, including the Debtors' business operations, capital structure, financial condition, and the reasons for and objectives of these chapter 11 cases, is set forth in the *Declaration of Louis E. Robichaux IV in Support of Chapter 11 Petitions and First Day Pleadings* [Dkt. No. 19].

COMPENSATION PAID AND ITS SOURCE

6. All services for which compensation is requested by DLA Piper were performed for or on behalf of the Debtors.

7. During the period covered by this Application, DLA Piper has received no payment and no promises for payment from any source for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between DLA Piper and any other person, other than the partners of DLA Piper, for the sharing of compensation to be received for services rendered in these chapter 11 cases.

FEE STATEMENTS

8. The fee statement for DLA Piper for the Compensation Period is attached to this Application as **Exhibit B**.² This fee statement contains daily time logs describing the time spent by each attorney and paraprofessional for the Compensation Period. The hourly rates set forth in **Exhibit B** are those customarily charged by DLA Piper for similar legal services. DLA Piper's fees for services rendered by lawyers, paralegals and other professionals are customary and usual in the legal community in which DLA Piper practices. To the best of DLA Piper's knowledge, this Application complies with sections 330 and 331 of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, the United States Trustee's Guidelines for Reviewing Applications for

² DLA Piper uses two separate matter numbers for internal organization and tracking of services provided to the Debtors. **Exhibit B**, attached to this Application, is organized by these matter numbers as well as project categories within these matter numbers.

Compensation and Reimbursement of Expenses filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases, the Guidelines for Compensation and Expense Reimbursement of Professionals for the United States Bankruptcy Court for the Northern District of Texas (the “Guidelines”), Rule 2016-1 of the Local Rules and the Interim Compensation Order.

ACTUAL AND NECESSARY EXPENSES

9. The Debtors seek allowance and payment pursuant to the Interim Compensation Order for the sum of \$19,139.35 for reimbursement of actual and necessary expenses. A summary of actual and necessary expenses and daily logs of expenses incurred by DLA Piper during the Compensation Period is attached this Application as **Exhibit C**. DLA Piper charges its clients \$.20 per page for black & white photocopying expenses (in accordance with the Guidelines). DLA Piper does not charge its clients for internet usage, outgoing facsimile transmissions, or long-distance carrier charges for outgoing facsimile transmissions.

10. DLA Piper believes the foregoing rates are at or below the market rates that the majority of law firms charge clients for such services. In addition, DLA Piper believes that such charges are in accordance with the American Bar Association’s (“ABA”) guidelines, as set forth in the ABA’s Statement of Principles, dated January 12, 1995, regarding billing for disbursements and other charges.

SUMMARY OF SERVICES RENDERED

11. The partners, associates, and attorneys of DLA Piper, who have rendered professional services in these cases during the Compensation Period are: Thomas R. Califano (Partner), Shmuel M. Klahr (Partner), Daniel M. Simon (Partner), Kathy Owen Brown (Senior Counsel), Karen Nelson (Partner), Michael Massiatte (Of Counsel), Kira L. Mineroff (Associate), Dienna Corrado (Associate), Crystal Jamison Woods (Associate), Andy Zollinger (Associate), Allison Amie Reddoch (Associate), David E. Avraham (Associate), Jason Daniel

Angelo (Associate), Mordechai Y. Sutton (Associate), Micala R. Bernardo (Senior Attorney), Adam C. Lanza (Associate), Marina Stefanova (Associate), Virginia Callahan (Associate), Tara Nair (Associate), Jade Williams (Associate) and Breegan O'Connor (Associate).

12. The paraprofessionals of DLA Piper, who provided services to these attorneys in these cases during the Compensation Period are: Melinda Masters (Legal Research Analyst), Maribel Nash (Legal Research Analyst), William Lee Countryman (Senior Paralegal), Erica Eason-Hall (Senior Paralegal), Yohami Lam Guerra (Paralegal Specialist), Derrell Grant (Litigation Support Analyst), Carolyn B. Fox (Paralegal Specialist), Jenny Ford (Paralegal Specialist) and Stephanie A. Lisko (Paralegal Specialist).

13. DLA Piper, by and through the above-named persons, has prepared or assisted in the preparation of various applications and orders submitted to the Court for consideration, advised the Debtors on a regular basis with respect to various matters in connection with these chapter 11 cases and has performed all necessary professional services that are described and narrated in detail hereinafter.

SUMMARY OF SERVICES BY PROJECT

14. The services rendered by DLA Piper during the Compensation Period can be grouped into the categories set forth below. These categories are generally described below, with a more detailed identification of the actual services provided set forth on the attached **Exhibit B**. The attorneys and paraprofessionals who rendered services relating to each category are identified, along with the number of hours for each individual and the total compensation sought for each category, in **Exhibit B** attached hereto. Although every effort has been made to properly and consistently categorize the actual services provided into the appropriate category, certain tasks could properly be categorized into two or more task codes.

A. Case Administration

Fees: \$13,300.00; Total Hours: 22.20

This category includes all matters related to filing documents with the Court, service thereof, maintenance of calendars and pleadings filings, preparation of hearing binders, preparation of agenda letters, and preparation of necessary notices and certifications in these chapter 11 cases.

B. Creditor Inquiries

Fees: \$5,669.00; Total Hours: 6.70

This category includes all matters related to responding to creditor, employee and resident inquiries regarding these chapter 11 cases

C. Asset Sales and Other Disposition of Assets

Fees: \$99,321.50; Total Hours: 122.50

This category includes all matters relating to and including asset sales, procedures for asset sales, implementation of bid procedures, diligence and discovery relating to the potential sale of substantially all of the Debtors' assets and potential objections and transaction work related to asset disposition.

D. Adequate Protection & Relief from Stay

Fees: \$32,048.50; Total Hours: 45.20

This category includes all matters relating to research and analysis of issues related to violations of or requests for relief from the automatic stay in the Debtors' bankruptcy cases and related matters. During the Compensation Period, the Debtors and their advisors addressed many issues pertaining to vendor contract performance and stay issues.

E. Meetings and Communications with the U.S. Trustee and Creditors' Committee

Fees: \$6,086.00; Total Hours: 6.50

This category includes all matters relating to, preparing for and attending meetings and communications with, among others, the Committee and the U.S. Trustee, including responding to inquiries regarding the cases, creditor treatment, the Debtors' ongoing operations and Committee investigations.

F. Court Hearings

Fees: \$82,746.00; Total Hours: 119.10

This category includes all matters relating to preparing for and attending court hearings.

G. Employment Applications

Fees: \$19,360.50; Total Hours: 23.20

This category includes all matters relating to the retention of various professionals on behalf of the Debtors, and ordinary course professional administration.

H. Fee Applications

Fees: \$21,829.00; Total Hours: 39.20

This category includes all matters relating to the preparation, of fee applications filed by professionals retained by the Debtors.

I. Litigation and Contested Matters

Fees: \$515,273.00; Total Hours: 690.30

This category includes all matters relating to and including analysis and preparation for all litigation and contested matters, including without limitation, drafting motions, responding to discovery requests and other papers related to application and enforcement and extension of the automatic stay.

J. Non-Working Travel

Fees: \$27,145.00; Total Hours: 65.00

This category includes all non-working travel time and is billed at 50% of the hourly rate.

K. Business Operations/Strategic Planning

Fees: \$164,282.00; Total Hours: 190.90

This category includes all issues relating to general debtor in possession operations in chapter 11, including, without limitation, the preparation and filing of the Debtors' operating reports and meetings between the Debtors and their professionals to develop a business strategy for the Debtors' cases and postpetition transactions with vendors.

L. Financial Reports (Monthly Operating Reports & Schedules & Statements)

Fees: \$9,350.00; Total Hours: 23.50

This category includes all matters relating to preparation of schedules and statements and monthly operating reports, including collecting data, retrieving documents, communications with the U.S. Trustee and any other applicable activities, including reviewing management reports and drafts of the monthly operating reports.

M. Financing/DIP/Cash Collateral Matters

Fees: \$13,679.00; Total Hours: 14.30

2. This category includes all matters under sections 361, 363 and 364 of the Bankruptcy Code, including debtor in possession financing, cash collateral, secured claims and loan document and lien analysis.

A. Claims Administration and Objections

Fees: \$13,162.00; Total Hours: 16.40

This category includes all matters related to claims administration including scheduling bar dates and related procedures.

B. Plan and Disclosure Statement/Business Plans

Fees: \$28,813.00; Total Hours: 32.30

This category includes all matters related to the *Debtors' Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code* and *Disclosure Statement for the Debtors' Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code* including discussions and negotiations with various constituencies.

Valuation of Services

15. Attorneys and paraprofessionals of DLA Piper have expended a total of 1,418.00 hours in connection with this matter during the Compensation Period, as follows:

Name of Professional Individual	Hours	Rate	Amount
Califano, Thomas R.	108.80	\$1,135.00	\$123,488.00
	9.00	\$567.50 (Non-working travel)	\$5,107.50
Klahr, Shmuel M.	4.80	\$1,130.00	\$5,424.00
Simon, Daniel M.	205.30	\$920.00	\$188,876.00
	15.00	\$460.00 (Non-working travel)	\$6,900.00
Brown, Kathy Owen	103.80	\$920.00	\$95,496.00
Nelson, Karen	11.50	\$775.00	\$8,912.50

Name of Professional Individual	Hours	Rate	Amount
Massiatte, Michael	38.70	\$740.00	\$28,638.00
Mineroff, Kira L.	4.70	\$905.00	\$3,258.00
Corrado, Dienna	165.10	\$875.00	\$144,462.50
	21.50	\$437.50 (Non-working travel)	\$9,406.25
Jamison Woods, Crystal	37.70	\$800.00	\$30,160.00
Zollinger, Andy	100.30	\$795.00	\$72,106.50
Reddoch, Allison Amie	24.40	\$775.00	\$18,910.00
Avraham, David E.	71.10	\$730.00	\$51,903.00
Angelo, Jason Daniel	2.80	\$710.00	\$1,988.00
Sutton, Mordechai Y	7.40	\$690.00	\$5,106.00
Bernardo, Micala R.	120.60	\$675.00	\$81,405.00
	2.50	\$337.50 (Non-Working Travel)	\$843.75

Name of Professional Individual	Hours	Rate	Amount
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Stefanova, Marina	23.80	\$615.00	\$14,637.00
Callahan, Virginia	42.30	\$560.00	\$23,688.00
Nair, Tara	53.20	\$535.00	\$28,462.00
Williams, Jade	41.00	\$535.00	\$21,935.00
O'Connor, Breegan	24.90	\$485.00	\$12,076.50
Masters, Melinda F.	6.40	\$380.00	\$2,432.00
Nash, Maribel	1.00	\$380.00	\$380.00
Countryman, William Lee	69.20	\$355.00	\$24,566.00
	8.50	\$177.50 (Non-Working Travel)	1,508.75
Lam Guerra, Yohami	3.10	\$345.00	\$1,069.50
Eason-Hall, Erica	3.30	\$340.00	\$1,122.00
Grant, Derrell	56.50	\$330.00	\$18,645.00

Name of Professional Individual	Hours	Rate	Amount
Fox, Carolyn B.	4.20	\$285.00	1,197.00
Ford, Jenny	4.50	\$280.00	\$1,260.00
Lisko, Stephanie A.	5.20	\$280.00	\$1,456.00
TOTALS	1,418.00		\$1,052,708.50

The nature of the work performed by these persons is fully set forth in **Exhibit B** attached hereto. The reasonable value of the services rendered by DLA Piper to the Debtors during the Compensation Period is \$1,052,708.50.

16. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by DLA Piper is fair and reasonable given (a) the complexity of these cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services and (e) the costs of comparable services other than in a case under this title. Moreover, DLA Piper has reviewed the requirements of the Guidelines and Local Rule 2016-1 and believes that this Application complies with both.

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WHEREFORE, DLA Piper respectfully requests that the Court authorize (a) that for the period from April 1, 2018 through April 30, 2018, an allowance be made to DLA Piper pursuant to the terms of the Interim Compensation Order, with respect to the sum of \$1,052,708.50 as compensation for necessary professional services rendered (80% of which equals \$842,166.40) and the sum of \$19,139.35 as reimbursement of actual necessary costs and expenses, for a total of \$1,071,847.85 and that such sums be authorized for payment, and (b) such other and further relief as this Court may deem just and proper.

Dated: June 4, 2018
Dallas, Texas

Respectfully submitted,

DLA PIPER LLP (US)

/s/ Andrew Zollinger
Andrew Zollinger, State Bar No. 24063944
DLA Piper LLP (US)
1717 Main Street, Suite 4600
Dallas, Texas 75201-4629
Telephone: (214) 743-4500
Facsimile: (214) 743-4545
Email: andrew.zollinger@dlapiper.com

-and-

Thomas R. Califano (admitted *pro hac vice*)
Dienna Corrado (admitted *pro hac vice*)
1251 Avenue of the Americas
New York, New York 10020
Telephone: (212) 335-4500
Facsimile: (212) 335-4501
Email: thomas.califano@dlapiper.com
dienna.corrado@dlapiper.com

-and-

Daniel M. Simon (admitted *pro hac vice*)
One Atlantic Center
1201 West Peachtree Street, Suite 2800
Atlanta, Georgia 30309
Telephone: (404) 736-7800

Facsimile: (404) 682-7800

Email: daniel.simon@dlapiper.com

Counsel for the Debtors